



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 5/28/2025

**MEMO ENDORSED**

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May 27<sup>th</sup>, 2025

**VIA ECF/CM**

Honorable Valerie E. Caproni, USDJ  
United States District Court  
For the Southern District of New York  
500 Pearl Street  
New York, New York 10007

***RE: BASS v. CGMI, 24-cv-04586(VEC)***

**RESPONDENT'S SUBMITTED EXHIBIT IN SUPPORT OF REPLY**

To The Honorable USDJ – Valerie E. Caproni, presiding:

Pursuant to and in compliance with USDJ – Valerie E. Caproni's, *Individual Practices for Pro Se Civil Cases, Rule 2. Communications with Chambers*, the Petitioner – Robert C Bass, in *propria persona*, respectfully request sealing of **EYES ONLY – STRICTLY CONFIDENTIAL** Letter addressed to Your Honor Only for review and consideration, regarding Respondent's Submitted Exhibit #1. DktEntry: 49-1, in Support of Reply to Petitioner's Motion for Reconsideration in support of summary judgement.

Respectfully Submitted,

s/Robert C Bass  
*In Propria Persona*

Application DENIED. *Ex parte* submissions are not permitted except in rare circumstances where a party demonstrates by a clear and specific showing why such a submission is necessary. Petitioner's application alleges that Respondent fabricated an exhibit it filed in opposition to Petitioner's motion for reconsideration. Even if Petitioner's allegation is true, the Court sees no basis for his application to be filed under seal and without notice to Respondent, which would be prejudiced by not being afforded the opportunity to respond to Petitioner's accusation.

The Clerk of Court is respectfully directed to unseal and lift the filing restrictions of the document filed at Dkt. 54.

Petitioner is also reminded that *ex parte* communication with Chambers is not allowed. Attached as Exhibits 1 through 3 are email communications that the Court received from Petitioner. If there is an urgent need to communicate with Chambers, Petitioner must copy opposing counsel on such communications. Prior to submitting any future sealing requests, Petitioner is directed to consult the Rule 5 of the Undersigned's Individual Practice Rules in Civil Cases, available at <https://www.nysd.uscourts.gov/hon-valerie-e-caproni>.

SO ORDERED.

 5/28/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

# EXHIBIT 1

**From:** [ROBERT B](#)  
**To:** [Caproni NYSD chambers](#)  
**Subject:** RE: Bass v. CGMI, 24-cv-04586 [EYES ONLY USDJ CAPRONI]  
**Date:** Tuesday, May 27, 2025 3:35:33 PM  
**Attachments:** [Letter to the Court.pdf](#)  
[OpenPGP\\_0x8442C2DFA0A37B3D.asc](#)  
[robert\\_c\\_bass.vcf](#)  
[OpenPGP\\_signature.asc](#)  
**Importance:** High

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**CAUTION - EXTERNAL:**

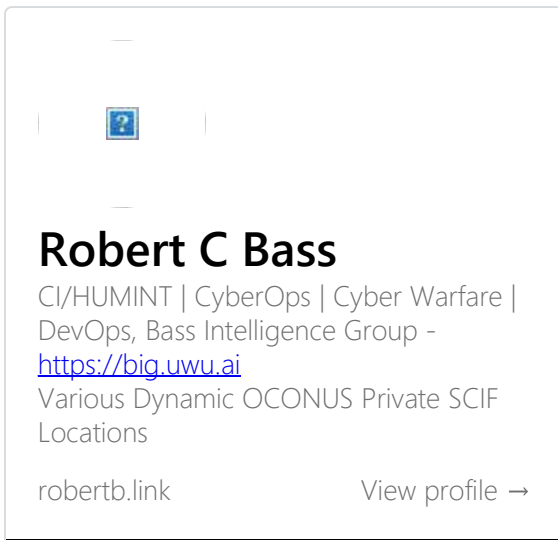
Dear Hon. USDJ, V. Caproni [EYES ONLY]:

Please see attached malware/virus-free scanned pdf letter for consideration and review for seal.

Respectfully Submitted,

s/Robert C Bass

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**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

# EXHIBIT 2

**From:** [ROBERT B](#)  
**To:** [Caproni NYSD chambers](#)  
**Subject:** Re: Request for Leave to Submit Letter for Sealing? [24-cv-04586, Bass v. CGMI]  
**Date:** Tuesday, May 27, 2025 4:29:39 PM  
**Attachments:** [OpenPGP\\_0x8442C2DFA0A37B3D.asc](#)  
[robert\\_c\\_bass.vcf](#)  
[OpenPGP\\_signature.asc](#)  
**Importance:** High

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**CAUTION - EXTERNAL:**

Done! Should I still file on ECF as ex parte? There is an option for this.? Unless the Your Honor will ultimately decide if it should be filed via ECF? Thank you for the guidance.

Respectfully,

s/Robert C Bass

On 5/27/2025 2:59 PM, Caproni NYSD chambers wrote:

Mr. Bass,

Please file your request for leave to submit the letter under seal on ECF.  
Undocketed *ex parte* email communications with Chambers are not permitted.

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**From:** ROBERT B [robert.c.bass@strategicsolutions.services](mailto:robert.c.bass@strategicsolutions.services)  
**Sent:** Monday, May 26, 2025 10:09 AM  
**To:** Caproni NYSD chambers [CaproniNYSDchambers@nysd.uscourts.gov](mailto:CaproniNYSDchambers@nysd.uscourts.gov)  
**Subject:** Request for Leave to Submit Letter for Sealing? [24-cv-04586, Bass v. CGMI]  
**Importance:** High

**CAUTION - EXTERNAL:**

Dear USDJ V. Caproni:

I am respectfully requesting leave to submit via email and or ECF/CM, **For Your Eyes Only, Strictly Confidential Letter** for Sealing and Review by Your Honor Only. Not for viewing by your Law Clerks.

The Confidential Letter addressed to Your Honor specifically involves the Respondent's reply and exhibit submissions in support. Sealing and Confidentiality is required and warranted to avoid public disclosure of a discovered action of fraud on the Court.

I am not one to engage in open or participate in matters to shame and unmask identified and confirmed actions to tamper with the equitable administration of justice with the Court.

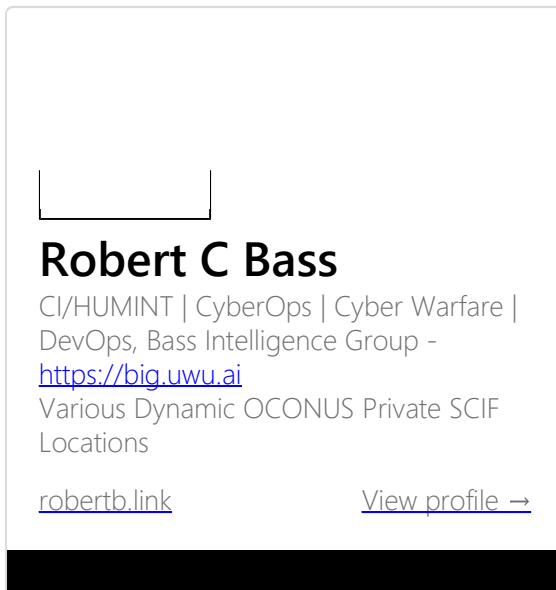
I have elected to not include Respondent's counsel of record in this email request to chambers, because it would defeat the general purpose of sealing the letter for EYES ONLY submission, review and consideration.

I am aware Your Honor has a Chamber policy of not allowing Pro Se Civil Litigants to be heard in Oral Argument. Not sure why not? But I respect Your Honor's local chamber rules and leave it Your Honor to decide if an exception to the rule will potentially be allowed in this instance, if the Court deems it is necessary and or appropriate.?

Respectfully Submitted,

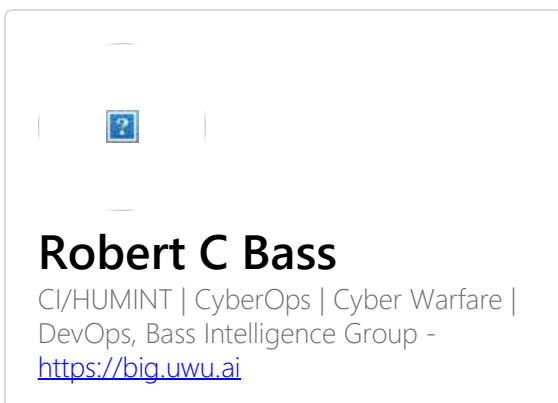
s/Robert C Bass

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# EXHIBIT 3



Various Dynamic OCONUS Private SCIF  
Locations

robertb.link

[View profile →](#)

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**From:** [ROBERT B](#)  
**To:** [Caproni NYSD chambers](#)  
**Subject:** RE: Bass v. CGMI [24-cv-04586]  
**Date:** Wednesday, May 28, 2025 10:17:43 AM  
**Attachments:** [EYES ONLY - USDJ V CAPRONI - STRICTLY CONFIDENTIAL.pdf](#)  
[OpenPGP\\_0x8442C2DFA0A37B3D.asc](#)  
[robert\\_c\\_bass.vcf](#)  
[OpenPGP\\_signature.asc](#)  
**Importance:** High

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**CAUTION - EXTERNAL:**

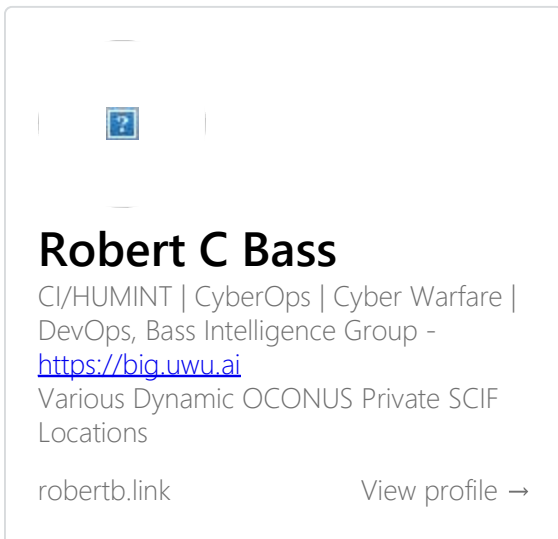
To Hon. USDJ Caproni;

Please forgive my error. The letter submitted for sealing consideration did not include the attached official correspondent with the NYAGO. Attached is the full letter with NYAGO letter correspondence addressed to me.

Respectfully Submitted,

s/Robert C Bass

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